

UNITED STATES BANKRUPTCY COURT**Western District of Washington – Seattle**In re: **Julian Flores**Case No: **11-20512-TWD**Chapter: **13**Property Address: **30845 10th Ave SW, Federal Way, WA 98023**

Last four digits of any number you use to

Identify the debtor's account: *******0083**Court Claim No. (if known) **3****RESPONSE TO NOTICE OF FINAL CURE PAYMENT**

As contemplated by Fed. R. Bankr. Proc. 3002

Wells Fargo Bank, N.A.("Creditor") hereby responds to that certain Notice of Final Cure Payment ("Cure Notice") dated **05/10/2017** and filed as Docket No. **86****Pre-Petition Default Payments** Applicable option is checked.☒ Agrees that Debtor(s) has paid in full the amount required to cure the default on Creditor's claim☐ Disagrees that Debtor(s) has paid in full the amount required to cure the default on Creditor's claim and states that the total amount due to cure pre-petition arrears is:Total Amount Due: **\$0.00**

Attached as Schedule of Amounts Outstanding on Prepetition Claim is an itemized account of the pre-petition amounts that remain unpaid as of the date of this response.

Post-Petition Default Payments Applicable option is checked.☐ Agrees that Debtor(s) is current with respect to all payments consistent with § 1322(b)(5) of the Bankruptcy Code.☒ Disagrees that Debtor(s) is current with respect to all payments consistent with § 1322(b)(5), and states that the total amount due to cure post-petition arrears is:Total Amount Due: **\$15,663.12***

*Wells Fargo is in the process of reconciling the account and will amend the response to Notice of Final Cure if necessary.

Attached as Schedule of Amounts Outstanding Post-Petition Claim is an itemized account of the post-petition amounts that remain unpaid as of the date of the Cure Notice. The amounts outstanding identified on the Schedule do not reflect amounts that became or may become due after the date of the Cure Notice, including any fees that may have been incurred in the preparation, filing, or prosecution of this response to the Cure Notice.

The amounts due identified on this response may not, due to timing, reflect all payments sent to Creditor as of the date of the Cure Notice. In addition, the amounts due may include payments reflected on the NDC but which have not yet been received and/or processed by Creditor.

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Schedule of Amounts Outstanding Post-Petition Claim

Description	Date	Amount
8 payments @ \$1957.89	10.15.2016 – 05.15.2017	\$15,663.12
Total		\$15,663.12

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Certificate of Service

I hereby certify that a copy of the foregoing Response to Notice of Final Cure Payment was served on the parties listed below by postage prepaid U.S. Mail, First Class or served electronically through the Court's ECF System at the e-mail address registered with the Court on

Date: May 31, 2017

Chapter 13 Trustee:	K Michael Fitzgerald
Trustee Address:	600 University St #2200
	Seattle, WA 98101
Trustee Email:	courtmail@seattlech13.com
Debtor's Counsel Name:	Lisa S. Tse
Debtor's Counsel Address:	Advantage Legal Group
	12207 NE 8th St
	Bellevue, WA 98005
Debtor's Counsel Email:	lisa@advantagelegalgroup.com
Debtor 1 Name:	Julian Flores
Debtor's Mailing Address:	28434 15th Avenue South
	Federal Way, WA 98003

/s/ Sheena Fernandez